UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CHEVRON CORPORATION,

Plaintiff,

Case No. 11-cv-0691 (LAK) ECF Case

v.

STEVEN DONZIGER, et al.,

Defendants,

NOTICE OF APPEAL

Notice is hereby given that Defendants Hugo Gerardo Camacho Naranjo and Javier Piaguaje Payaguaje ("Ecuadorian Plaintiffs") appeal to the United States Court of Appeals for the Second Circuit from the Order entered in the above-captioned matter on April 12, 2013 (Dkt. 1012), granting the motion of Plaintiff Chevron Corporation ("Chevron") to compel discovery from non-parties Laura Garr, the law firm Kohn Swift & Graff, P.C., and Joseph Kohn. Defendants Steven Donziger, The Law Offices of Steven R. Donziger, and Donziger & Associates, PLLC, join in this appeal for the purpose of preserving any work-product objections not available to the Ecuadorian Plaintiffs.

Dated: May 10, 2013 Respectfully submitted,

By: /s/ Tyler G. Doyle

Ty Doyle

Craig Smyser (admitted *pro hac vice*) Larry R. Veselka (admitted *pro hac vice*) SMYSER KAPLAN & VESELKA LLP 700 Louisiana, Suite 2300

Houston, Texas 77002 Tel: (713) 221-2330

Fax: (713) 221-2320 Email: tydoyle@skv.com

/s/ Julio Gomez

Julio C. Gomez
SDNY Bar No. JG0005
GOMEZ LLC
ATTORNEY AT LAW
The Trump Building
40 Wall Street, 28th Floor
New York, NY 10005

Tel: 212-400-7150 Fax: 212-400-7151

Email: jgomez@gomezllc.com

ATTORNEYS FOR DEFENDANTS, HUGO GERARDO CAMACHO NARANJO And JAVIER PIAGUAJE PAYAGUAJE

/s/ John W. Keker

John W. Keker (pro hac vice)

Elliot R. Peters

Jan Nielsen Little (pro hac vice)

Matthew M. Werdegar (pro hac vice)

KEKER & VAN NEST LLP

633 Battery Street

San Francisco, CA 94111-1809

Telephone: (415) 391-5400

Facsimile: (415) 397-7188

Email: jkeker@kvn.com

Email: epeters@kvn.com

Email: jlittle@kvn.com

Email: mwerdegar@kvn.com

ATTORNEYS FOR STEVEN DONZIGER, THE LAW OFFICES OF STEVEN R. DONZIGER, AND DONZIGER & ASSOCIATES, PLLC

413932.1